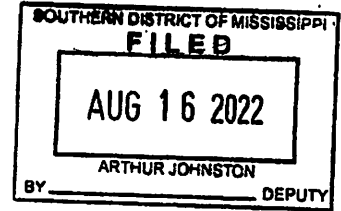


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:22CR102-TBM-BWR

MICHAEL WAYNE SHAVERS

18 U.S.C. § 922(x)(1)(A)

18 U.S.C. § 922(a)(6)

The Grand Jury charges:

COUNT 1

On or about March 14, 2022, in Hancock County, within the Southern Division of the Southern District of Mississippi, the defendant, **MICHAEL WAYNE SHAVERS**, did knowingly deliver and otherwise transfer a handgun, that is a Glock 40GEN4, 10mm pistol, to B.M., knowing and having reasonable cause to believe that B.M. was a juvenile, in that he had not attained the age of eighteen.

In violation of Title 18, United States Code, Sections 922(x)(1)(A) and 924(a)(6)(B)(i).

COUNT 2

On or about March 14, 2022, in Hancock County, within the Southern Division of the Southern District of Mississippi, the defendant, **MICHAEL WAYNE SHAVERS**, in connection with the acquisition of a firearm, that is, a Glock 40GEN4, 10mm pistol, from Art of War Custom, LLC, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious oral and written statement to Art of War Custom, LLC, which statement was intended and likely to deceive Art of War Custom, LLC, as to a fact material to the lawfulness of such sale and acquisition of the said firearm to the defendant, under Chapter 44 of Title 18, United States Code, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives form 4473, Firearms Transaction Record, to the effect that he was the actual transferee/buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses.

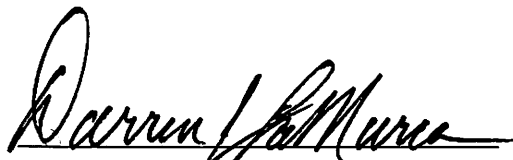
The grand jury has determined that probable cause exists to believe that the following property is subject to forfeiture as a result of the offenses alleged in this indictment:

One (1) Glock, Model 40GEN4, 10mm Pistol, Serial number BVLS545.

Further, if any property described above, as a result of any act or omission of the defendant:


(a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Section 924(d)(1); and Title 28, United States Code, Section 2461(d).


DARREN J. LAMARCA
United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 16th day of August 2022.


UNITED STATES MAGISTRATE JUDGE